September 15, 2016

Jennifer Kostesich, Project Officer
Division of Medicaid Expansion Demonstrations
Centers for Medicare and Medicaid Services
7500 Security Boulevard
Baltimore, MD 21244

*Re: Comments on 1115 Demonstration Amendment NH Health Protection Program
Premium Assistance Project #11-W-00298/1*

Dear Ms. Kostesich,

We are appreciative of this opportunity to share our comments with regard to the 1115
Demonstration Amendment NH Health Protection Program Premium Assistance Project
#11-W-00298/1. The NH Health Protection Program is essential to the well-being of
low-income people in New Hampshire, and provides greater security and cost-savings
for our entire state.

We write to express strong opposition to the proposed citizenship verification
requirements, primarily on the grounds that they appear to deny Medicaid access to
recently resettled refugees and legal immigrants who have been in the U.S. for the five
year waiting period. Our obligation to ensure the well-being of refugees resettled in
New Hampshire, as well as Legal Permanent Residents who have fulfilled the
substantial residency requirement, requires that their access to Medicaid be preserved.
Our position in favor of their eligibility is reflected in current federal law.

Furthermore, the requirement for two forms of citizenship identification is burdensome
for applicants as well as the Department of Health and Human Services. It is at odds
with federal law's intent to sensibly streamline the Medicaid application and enrollment
process for qualified program participants and for state governments. The additional
documentation requirements would be burdensome for applicants and enrollees, and
would result in lack of access to health care for qualified individuals as well as an
unnecessary administrative burden and expense to the state. It is a proposal that
merits rejection by CMS.

Thank you for your consideration of our perspective on this matter.

Maggie Fogarty and Arnie Alpert, Co-Directors of the NH Program